

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.,

Defendant.

Case No. 2:23-cv-00050-JRG

**DECLARATION OF KRISHNAN PADMANABHAN IN SUPPORT OF
DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
PROTECTIVE ORDER**

I, Krishnan Padmanabhan, declare as follows:

1. I am an attorney and am admitted pro hac vice to practice in the Eastern District of Texas Marshall Division. I am a partner with the law firm of Winston & Strawn LLP, which represents Defendant Charter Communications, Inc. (“Charter” or “Defendant”) in the above-captioned matter. I submit this declaration in support of **Defendant’s Unopposed Motion for Extension of Time to File Protective Order**. I know the facts set forth in this declaration to be true of my own personal knowledge, and if called as a witness, I could and would testify competently to the matters set forth herein.

2. Charter sent its redlines on the protective order to Entropic on June 20, 2023, at 10:36 AM CST.

3. Entropic did not respond. Charter prompted Entropic on June 26 at 2:54 PM CST.

4. Entropic responded later that day (on June 26) at 4:54 PM CST, with comments and revisions that required further discussion.

5. Charter contacted Entropic today, June 27, with questions about Entropic's comments and revisions, and to work through Entropic's comments and revisions. Charter also proposed further comments and revisions. Entropic assured Charter that it would respond to Charter's questions, comments, and revisions, but it has not yet responded.

6. Despite its delay in responding to Charter regarding the protective order from June 20 to June 26, and its delay in responding to Charter's questions regarding Entropic's edits, Entropic declined to join this motion. Charter does not file this motion for purpose of delay, but so that the parties may engage in discussions and work towards finalizing the protective order.

7. Attached hereto as **Exhibit A** is a true and correct copy of an email chain between counsel for Comcast and counsel for Entropic, beginning on June 13, 2023 until today, June 27, 2023.

Dated: June 27, 2023

Respectfully submitted,

/s/ Krishnan Padmanabhan
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